

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

UNITED STATES OF AMERICA,)
)
Petitioner,)
)
v.) No. 4:24-CV-92
)
ALLIANCE PARK LLC; BRICKYARD)
PLACE LLC; CENTEX)
MANAGEMENT, LLC; DEERWOOD)
POINT LLC; HONEY PARK LLC;)
MARIAH MARIE LLC; UNION GL)
PARK LLC; GOVERNORS)
MANAGEMENT LLC; and)
THE PRUDENTIAL REALTY LLC;)
)
Respondents.)
)

**RESPONDENTS' ANSWER TO PETITION FOR SUMMARY
ENFORCEMENT OF CIVIL INVESTIGATIVE DEMANDS**

Respondents Alliance Park LLC, Brickyard Place LLC, Centex Management, LLC, Deerwood Point LLC, Honey Park LLC, Mariah Marie LLC, Union GL Park LLC, Governors Management LLC, and The Prudential Realty LLC (“Respondents”), by and through undersigned counsel, answers the United States’ Petition for Summary Enforcement of Civil Investigative Demands (“Petition”) as follows:

ANSWER

To the extent a response is required, Respondents deny all allegations contained in the unnumbered summary paragraph of the Petition.

1. Paragraph 1 contains a legal conclusion to which no response is necessary.
2. Paragraph 2 contains a legal conclusion to which no response is necessary.

PARTIES

3. Paragraph 3 contains a legal conclusion to which no response is necessary.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.

ISSUANCE AND SERVICES OF THE CIDS

13. Respondents are without sufficient information to admit or deny the remaining allegations of Paragraph 13.
14. Respondents admit that CIDs were issued on or about October 19, 2023. Respondents are without sufficient information to admit or deny the remaining allegations of Paragraph 14.
15. Respondents admit that CIDs were issued on or about November 1, 2023. Respondents are without sufficient information to admit or deny the remaining allegations of Paragraph 15.
16. Respondents are without sufficient information to admit or deny Paragraph 16.
17. Respondents are without sufficient information to admit or deny Paragraph 17.
18. Respondents are without sufficient information to admit or deny Paragraph 18.
19. Respondents are without sufficient information to admit or deny Paragraph 19.
20. Respondents are without sufficient information to admit or deny Paragraph 20.

21. Respondents are without sufficient information to admit or deny

Paragraph 21.

22. Respondents are without sufficient information to admit or deny

Paragraph 22.

23. Respondents are without sufficient information to admit or deny

Paragraph 23.

24. Respondents are without sufficient information to admit or deny

Paragraph 24.

RESPONDENTS REFUSE TO RESPOND

25. Admitted.

26. Admitted.

27. Respondents admit that they declined to respond to the CID

interrogatories on the basis of the Fifth Amendment to the United States

Constitution. The remainder of Paragraph 27 is denied.

28. Admitted.

29. Admitted.

30. Denied

31. Denied.

Any and all allegations contained in the United States' Petition not expressly admitted above are hereby denied.

WHEREFORE, Respondents respectfully requests that none of the requested relief be entered against them.

Respectfully submitted, this 22nd day of July, 2024.

CHILIVIS GRUBMAN, LLP

/s/ Scott R. Grubman

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2024, I electronically filed the foregoing Answer with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

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/s/ Scott R. Grubman _____

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